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February 17, 2000

John R. Velasquez, Jr.
Acting Central Enforcement Docket Supervisor
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 4963
Cable News Network (CNN)

Dear Mr. Velasquez:

This letter responds to the complaint filed with the Commission by LaRouche's Committee For A New Bretton Woods (hereinafter Complainant) on January 18, 2000, which was served on CNN on February 3, 2000. Enclosed herewith is a signed Statement of Designation of Counsel. CNN appreciates the opportunity to respond and does so as follows.

The Complainant alleges that CNN will be making an illegal corporate contribution to the presidential campaigns of Vice-President Albert Gore and Bill Bradley when it sponsors a debate between the two candidates without inviting Lyndon H. LaRouche to also participate. CNN is not owned or controlled by a political party, political committee or candidate. Therefore, CNN may "stage" candidate debates without violating the prohibition on corporate contributions as long as the structure of the debates meets the criteria set forth in 11 CFR §110.13(b), and the selection of candidates follows CNN's pre-established objective criteria.

The debate complained of is to take place on March 1, 2000. Structurally, the debate will involve two of the candidates seeking the Democratic nomination in August. In inviting these two candidates, CNN considered each candidate in relation to its pre-established criteria set forth below:


1. Is the candidate actively campaigning;
2. The candidate's ability to fundraise/level of financial support;
3. Had the candidate won 10% of the votes in a caucus or primary;
4. Where did the candidate stand in the public opinion polls;
5. Is the candidate on the California ballot.

Because this debate will take place in California prior to the California primary, the fifth criterion was also considered. Although Mr. LaRouche is a candidate on the California ballot, Mr. LaRouche did not receive 10% of the votes in the New Hampshire primary. Furthermore, CNN has no evidence that he is actively campaigning, and Mr. LaRouche continues to rate very low, if at all, in public opinion polls. Based on this evaluation, CNN has determined it will not invite Mr. LaRouche to participate in the March 1 debate.

CNN's coverage of political news stories, including its participation in staging political debates, is both balanced and fair and not to the benefit of any particular candidate or political party. Notwithstanding the fact that CNN has complied with the Commission's rules regarding the staging of candidate debates, CNN expressly reserves its rights under the First Amendment to the U.S. Constitution. CNN respectfully requests the Commission take no further action against it and dismiss this complaint.

Again, CNN appreciates the opportunity to respond. If you have any questions regarding this response, please do not hesitate to contact me.

Respectfully submitted,


Barbara W. Bonfiglio
Counsel for CNN

Cc: Susan Tungate, Esq.
CNN

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4963

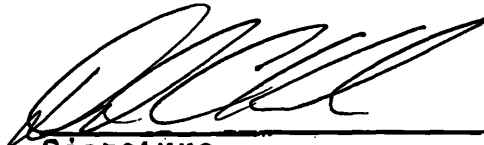
NAME OF COUNSEL: Barbara W. Bonfiglio

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TELEPHONE: (202) 659-8201

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

2/15/00
Date


Signature

RESPONDENT'S NAME: Cable News Network LP, LLLP

ADDRESS: One CNN Center, Box 105573
Atlanta, GA 30348-5573

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